



Stakeholder Engagement Plan

Project: Buciumi BESS Project (88 MW / 176 MWh), Bacău County,
Romania

Client: SCATEC ASA

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June 2026

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DISCLAIMER: The current report includes information as made available by the project owner and its consultants, prior to the completion of the report. Any change in the technical design, or additional data available might change the results of the assessment report.

1. Introduction

The current document is developed in the framework of the Environmental and Social Assessment for the development, construction, and operation of the Buciumi BESS Project located in Bacău County, Buciumi ATU, with aggregate capacity of 88 MW/176 MWh (the “Project”).

The Project is currently under development by Scatec ASA. The development will be supported by a Romanian registered Special Purpose Vehicle (SPV) company, Energy Storage Investment SRL.

The Stakeholders Engagement Plan (SEP) is a management plan which will be used during the construction and operation period of the Project. The SEP includes generic and specific stakeholders’ engagement actions, adapted to the project needs.

Scatec has established a comprehensive framework for stakeholder engagement and community development, aligning with international standards such as the IFC Environmental & Social (E&S) Performance Standards and the UN Guiding Principles on Business and Human Rights. The SEP is intended to align and complement the existing framework.

The SEP is a guiding document that maps the main categories of stakeholders that will be meaningfully engaged within the construction and implementation of a project. This SEP highlights the way the Project plans to communicate with these stakeholder groups who may be affected by or interested in the Project’s operations and activities. It focuses on:

- ❖ Identification of stakeholders who are likely to be affected and have an interest to the project;
- ❖ Establishment of engagement methods that are suitable for each identified category of stakeholder;
- ❖ Documentation of previous engagement activities and stakeholder feedback;
- ❖ Development and implementation of the future stakeholder engagement programme, and methods of engagement;
- ❖ Introduction of the Project’s grievance mechanism;
- ❖ Monitoring and evaluation of engagement actions, and;
- ❖ Roles and Responsibilities.

The development of the SEP was done following a participatory approach. Scatec’s team, together with the consultants’ team identified the key stakeholders relevant for this Project and defined the appropriate engagement methods for each of them.

The SEP is a ‘live’ document that will be progressively developed through updated versions in line with the phases of the Project. The SEP will be made publicly available on the project sponsor website and will also be made accessible to local communities as part of the project information disclosure policy and programme as described below.

The project respects each stakeholder’s Right to Privacy, which is relevant to this SEP in terms of handling personal or private information and ensuring the confidentiality of communications, including those related to grievances.

The current version of SEP focuses on the activities that will take place during the initial stages of the construction phase and construction phase..

2. Regulations, Requirements and Practices Regarding Stakeholder Engagement

2.1. National Legal Framework

At national level, there are no specific requirements for preparing a dedicated Stakeholder Engagement Plan. Nevertheless, some provisions for stakeholder engagement are included in several regulations and procedures, including:

- ❖ The Romanian Constitution, which stipulates in article 31 (1) that “a person's right of access to any information of public interest cannot be restricted” and in article 31 (2) that “the public authorities, according to their competence, shall be bound to provide for correct information of the citizens in public affairs and matters of personal interest”;
- ❖ Law no. 86/2000, for ratification of the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, signed in Aarhus on 25 June 1998 (Aarhus Convention).
- ❖ Law no. 544 of October 12th, 2001 regarding the free access to information of public interest, which defines and details the free access of any person to any piece of information of public interest, which, as a general principle, constitutes one of the fundamental principles of the relationship between citizens and public authorities in accordance with the Constitution of Romania and with the international undertakings ratified by the Parliament of Romania.
- ❖ Law no. 544/2001 stipulates further that the public authorities or institutions will ensure that access to information of public interest shall be done ex officio or upon request, through the intermediary of the department for public relations or through the intermediary of the person appointed for this purpose.
- ❖ Government Decision no. 878/2005 on right to access to environmental information transposes EU Directive 2003/4/CE from 28 January 2003 (on right to access to environmental information and repealing the Directive no. 90/313/CEE) and ensures the right to access environmental information held by or for the public authorities and sets out the conditions, general terms and ways to exercise that right.
- ❖ Emergency Government Ordinance no. 195/2005, related to the environmental protection, as amended from time to time, clearly stipulates in article 5 that the state recognizes the right of any person to an “ecologically healthy and balanced environment” and for this purpose, the state warrants, inter alia, free access to environment related information, including the right of any person to be consulted during a process of making environment-related decisions (i.e. legislation, plans and programs) and the right to access to justice.
- ❖ Further, article 20 of Emergency Government Ordinance no. 195/2005 clearly stipulates that the Competent Authority for Environmental Protection together with all other local and central public authorities, if the case, will ensure proper access to information, participation of the public in specific activities related to decisions and access to justice in accordance with the requirements of the Aarhus Convention;
- ❖ Law no. 292/2018 on the environmental impact assessment pertaining to certain public and private projects. In accordance with the stipulations of this Law, the relevant information has to be made publicly available by the investor and/or the national authorities during each of the EIA stages listed in article 8 of the same. Public Consultations and open disclosure of documentation connected with the Project have

to be carried out and financed by the Investor in close connection with the guidance given by the relevant authority and consistently with the requirements of the relevant Romanian legislation (see in this respect, Section 3 Public information and participation in the environmental impact assessment procedure, art. 15 and 16 of the Law).

- ❖ Order 1825 / 2016 on the approval of the guidelines for environmental impact assessment. These guidelines have been developed for the following categories of projects: groundwater abstraction and water supply systems, wastewater treatment plants and sewerage networks, flood prevention and protection works, integrated waste management system projects, highway and road construction projects, railway construction projects, flue gas desulphurization projects for large combustion plants.
- ❖ Order 269 / 2020 on the approval of the general guide applicable to the stages of the environmental impact assessment procedure, the guide for environmental impact assessment in a transboundary context and other specific guides for different areas and categories of projects. This order sets out general guidance applicable to all stages of the environmental impact assessment procedure, including aspects related to transboundary contexts. Apart from the general guidance, it addresses municipal waste incineration, quarries and surface mining operations (including industrial installations for extraction), facilities for the intensive rearing of farm animals, hydroelectric power production facilities, and land use changes involving afforestation or deforestation.
- ❖ Order 1682 / 2023 on the approval of the Methodological Guide on the appropriate assessment of the potential effects of plans or projects on protected natural areas of community interest. Order no. 2701/2010, the Methodology regarding the mechanism of information and consultation of the public on the occasion of preparing or revising the zonal planning and urbanism plans enacted by the Ministry for Regional Development and Tourism, which provides the legal framework for performing the information disclosure and public consultation as a prerequisite for approving any urbanism and zonal planning documents.
- ❖ Law no. 52/2003 on decisional transparency in public administration. This law has the role to enhance the accountability of government to the citizen and the beneficiary of the administrative decision, and to increase the involvement of citizens in decision-making processes of the administrative and legislative drafting process, to enhance transparency across government.

2.2. EBRD Requirements

Due to the fact that this Project is co-financed with the financial support of International Financing Institutions, their requirements and social policies, especially the ones on stakeholders' engagement are also applicable. The stakeholder engagement is important for building strong, constructive and response relationships with all interested and impacted persons/institutions. **EBRD's Environment and Social Requirements 10 (ESR10)** states that national laws and regulations regarding public information disclosure and consultation must always be considered when developing and implementing a project. Also, EBRD's Environment and Social Requirements 8 (ESR8) states that consultation with stakeholders and affected communities should be made in the context of cultural heritage issues.

In the event that national laws are insufficient or there are significant discrepancies between national and ESR 10 provisions, then the following principles will be considered:

- ❖ Promoting transparent communication between the project promoter, its workforce, the local communities directly affected by the project, and other interested stakeholders;
- ❖ The involvement of the stakeholders has to be a process free of manipulation, interference, coercion and intimidation.
- ❖ The involvement of the stakeholders has to be adapted on the basis of the project impacts over them (direct/indirect) and their level of influence and interest towards the project. Vulnerable groups will be identified, and specific actions will be undertaken to ensure that the Project will not contribute to the existing vulnerabilities and possible barriers to their participation in the engagement process are eliminated;
- ❖ The involvement of stakeholders is a process which must take place in the early stages of the project, and continue throughout the entire life of the project; and
- ❖ Ensuring access to an appropriate, fair complaints management mechanism for stakeholders to submit their questions, concerns or grievances about the project.

2.3. Company Practices

Scatec's approach to stakeholder engagement is defined by a structured and inclusive framework aligned with international sustainability standards. As detailed in its 2025 Annual Integrated Report, the company engages with stakeholders through ongoing processes at corporate, national, and project levels, aiming to ensure that perspectives from affected and interested parties are taken into account throughout the project lifecycle.

Stakeholders are identified and prioritized according to their level of influence on, and interest in, Scatec's activities. These include local communities, employees, investors, public authorities, civil society organizations, suppliers, and partners. Engagement is designed to be context-specific, enabling Scatec to respond to the needs and expectations of different stakeholder groups in a targeted and effective manner.

A central component of this engagement framework is the application of double materiality assessments, which help determine key sustainability issues by considering both the impact of the company's activities on people and the environment, and how such issues may affect the company itself. Stakeholder input is incorporated into these assessments to inform strategic priorities and sustainability reporting.

Scatec applies a range of methods to support stakeholder engagement, including formal consultations, grievance mechanisms, community liaison officers, stakeholder surveys, and partnerships with non-governmental or local institutions. These mechanisms are intended to facilitate dialogue, address concerns, and contribute to risk management.

The integration of stakeholder feedback into project development and operational processes is part of Scatec's broader ESG approach. Engagement activities are intended to inform decision-making, support regulatory compliance, and contribute to the long-term viability and acceptance of the company's renewable energy projects.

The company notes that stakeholder engagement and transparent communication play an important role in maintaining operational continuity and meeting its environmental and social commitments across diverse geographic contexts.

3. Project Description

3.1. Brief Project Description

The Buciumi Battery Energy Storage System (BESS) Project is a utility-scale energy storage development promoted by SCATEC ASA through the Romanian Special Purpose Vehicle (SPV) Energy Storage Investment SRL. The Project consists of an 88 MW / 176 MWh battery energy storage facility located in Buciumi Administrative Territorial Unit (ATU), Bacău County, Romania.

The Project includes the following main components:

- A lithium iron phosphate (LFP) battery energy storage facility;
- Twenty-two inverters with an installed inverter capacity of approximately 96.6 MW;
- A 110/20 kV substation equipped with a 100 MVA transformer;
- An approximately 1.4 km long 110 kV underground transmission line;
- Grid connection facilities within the existing Gutinaş 400/220/110 kV substation.

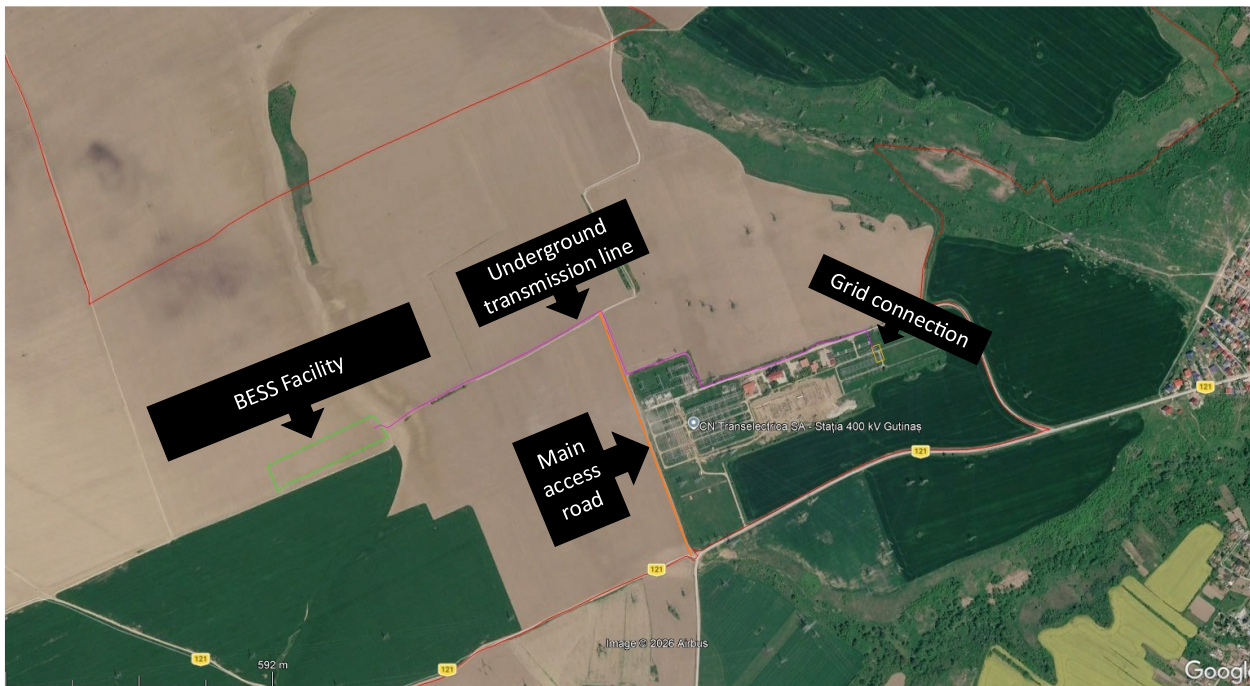


Figure 1 Project components and their location

The BESS facility will provide grid balancing services, improve network stability, facilitate integration of renewable energy generation and contribute to the decarbonisation of Romania's

energy sector. Construction is expected to commence in Q3 2026 and continue until Q3 2027. The operational lifetime is expected to exceed 15–20 **years**.

The Buciumi BESS Project includes the elements presented in the figure below.

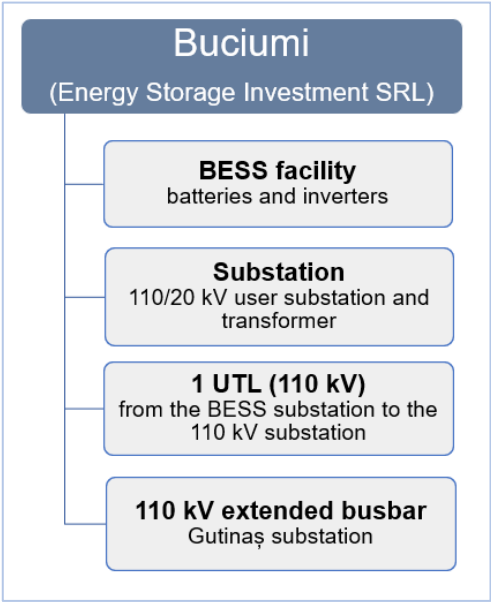


Figure 2 Project components

The 110/20 kV BESS substation connects via a 110 kV UTL to the 400/220/110 kV Gutinaş substation. The equipment associated with the underground connection will be installed along the agricultural roads, public domain of Buciumi ATU. The UTL will extend over a length of approximately 1.4 km and an area of approx. 4,150 sqm will be used for the temporary and permanent works.

The connection of the BESS facility to the SEN is achieved by installing a new, fully equipped connection bay within the substation. The equipment associated with the new bay will establish the connection between the 110 kV UTL and the 110 kV extended busbar. The equipment will be mounted on metal structures placed on insulated concrete foundations. The work will also include the integration of the new cell into the existing control, signalling, measurement and protection systems.

3.2. Activities Foreseen for 2026

During the coming year (2026) the project is expected to enter in its construction stages, with the connection of the project to the national grid expected to be completed by 2027.

The table below presents the scheduled activities for 2026 - 2027.

Table 1 Activities planned for 2026

Indicative period	Activity	Description
Q3 2026	Pre-construction mobilisation	Contractor appointment, final design confirmation, mobilisation, site signage, access route confirmation and grievance channel disclosure.
Q3-Q4 2026	Site preparation and civil works	Topsoil management, grading, drainage, internal roads, laydown area, fencing and foundations.
Q4 2026-Q2 2027	BESS equipment delivery and installation	Delivery and installation of battery containers, inverters, cabling, auxiliary systems and supplier supervision.
Q4 2026-Q2 2027	Substation works	Civil foundations, transformer delivery and installation, control/protection equipment and testing.
Q1-Q2 2027	UTL installation and HDD crossings	Trenching, cable installation, HDD undercrossings, crossings coordination and reinstatement.
Q2-Q3 2027	Testing, commissioning and energization	Testing, grid compliance, safety checks, commissioning and energization.
Q3 2027 onwards	Operation	Routine O&M, inspections, emergency preparedness and periodic stakeholder communication.

3.3. Institutional Setup for Project Development and Implementation

The project is owned by Scatec Solar Netherlands B.V. and will be developed via one SPV, Energy Storage Investment Ltd.

The institutional structure which will be used during the construction phase includes the following entities:

- The SPV (Energy Storage Investment Ltd) – engaged in obtaining all the permits, engaged in Engineering, Procurement and Construction (EPC), Operation and Maintenance (O&M) and procurement agreements for the project and will also supervise the construction works;
- Scatec ASA, through Scatec Solar Netherlands B.V. – decision makers and project owners.

During construction, Scatec site team will comprise the following roles and responsibilities: Site-based Construction Manager, HSSE, Quality, planner, discipline supervision for civil, electrical, HV and BESS, plus commissioning support closer to energization. Several contractors will be engaged, and the following arrangements will be followed:

Table 2 Proposed contractual arrangements

Contractor	Base assumption
HV EPC	One turnkey HV contractor for the on-site substation and 110 kV cable scope, with the TSO bay works contracted through Transelectrica but managed by Scatec

BESS civil	CBoP contractor for site preparation, foundations, roads, drainage, fencing, laydown and O&M building
BESS electrical	EBoP contractor for BESS electrical installation, cabling, terminations, testing support and commissioning support
BESS supplier / O&M	Supplier personnel during installation supervision, commissioning, SAT, grid compliance and LTSA interface

4. Stakeholder Identification and Analysis

Stakeholder identification is a key step in managing the stakeholder engagement process. The objective of this task is to identify which groups, organizations and individuals may be affected by the project or have interest in the development of the project.

Taking into consideration the status and scope of the project, the categories of identified stakeholders are detailed in the upcoming table. Based on the interaction between the Project and the stakeholders this list will be updated, if necessary, during the annual SEP update.

Stakeholder analysis is achieved by assessing the position of each stakeholder in the context of the project preparation phase.

Each identified stakeholder has been analysed from following perspectives: the project impacts on them, their estimated interest in the project and their potential influence over the project. To determine engagement priority levels (High, Medium, Low), stakeholders were assessed based on two core criteria:

1. **Degree of Impact** – the extent to which the stakeholder is directly or indirectly affected by project activities (e.g., land use, access disruption, noise, safety risks).
2. **Interest in the project** – the stakeholder's level of interest in the Project and their potential influence on its successful implementation (e.g., land rights, regulatory authority, community leadership).

Based on this assessment, stakeholders were categorized as follows:

- **High Priority:** Stakeholders likely to experience direct, significant, or sustained impacts from the project and/or who have strong influence or decision-making power. This includes neighbouring landowners, vulnerable community members, and permitting authorities. These groups require regular, direct, and proactive engagement (e.g., one-on-one meetings, safety briefings, targeted consultations).
- **Medium Priority:** Stakeholders with moderate impact or influence, such as local businesses or general community members not directly affected by construction. These groups are engaged through periodic updates, group meetings, and grievance mechanisms.
- **Low Priority:** Stakeholders with limited impact or interest, typically with indirect or no exposure to project impacts. These are informed primarily through public communications and have access to the grievance mechanism if needed.

The below table presents the main outcomes of this analysis.

Table 3 Stakeholder categories

Category of stakeholders	Stakeholders	Interest in the project	Potential impacts	Engagement Priority
Authorities	National/ Regional Authorities (Ministry of Energy, ANRE, Environmental Authorities, Bacau County Council.	Ensuring the project is developed in compliance with national regulations, permitting conditions, energy policy objectives, and environmental standards.	Reputational or compliance risks if project obligations are not met Regulatory alignment critical for project approvals and grid connection	High engagement priority Regular coordination, timely updates, and formal communication throughout the construction phases.
	Transelectrica – National Grid Operator	The project will connect to Transelectrica's transmission infrastructure. Company has direct interest in the substation and grid connection point.	Direct impact on transmission line(s) during grid connection Infrastructure must be built to Transelectrica's technical specifications.	High engagement priority The project will have to be permanently in touch with Transelectrica especially when the connection will take place, but also during construction and operation of the poles and the station, to ensure any impact on the local stakeholders is adequately and timely addressed.
	Buciumi Municipality from ATUs where BESS will be located	Ensuring project respects local construction permits. Interested in community benefits via CSR programmes and local employment.	Reputational or compliance risks if project obligations are not met Potential economic benefits for local communities through taxes and CSR, potential employment opportunities.	High engagement priority Structured collaboration, regular updates, and opportunities to align on local development goals and community relations.
Local communities	Members of local communities situated in the proximity of the Project site, namely: Buciumi, Rădeana	Interested in project impacts (positive and negative), employment opportunities, and CSR programmes.	Construction disturbances: noise, dust, traffic, temporary access restrictions Long-term visual and land-use changes Employment and economic opportunities	High engagement priority Ongoing communication, public meetings, and accessible channels for feedback and grievances to ensure concerns are addressed and benefits are shared transparently.
	Neighbours – owners and users - of the land plots	Interested in understanding the actions which will take place on the neighbouring lands.	Restricted access, increased traffic, noise, and disruption to agricultural activities	High engagement priority

Category of stakeholders	Stakeholders	Interest in the project	Potential impacts	Engagement Priority
	and the access roads used for the project	The owners/users are interested in understanding if there will be any restriction or disruptions on access roads used for agricultural activities and for BESS project construction.	Temporary or permanent changes to land access routes.	One-on-one meetings, clear communication of schedules and impacts, and prompt resolution of any access-related grievances.
	Owners and users of the land plots used for the UTL	The owner/user are interested to understand the restrictions imposed by the UTL and the potential impacts generated by maintenance works on the line and the mitigation measures.	Land use restrictions, visual intrusion, and need to accommodate long-term maintenance of transmission infrastructure	High engagement priority Direct engagement, clear explanation of rights and obligations under superficies or easement agreements, and access to the grievance mechanism.
Shareholders and IFIs	Shareholders and International Financial Institutions	Timely and effective project implementation in line with all permit provisions, IFI performance standards, and compliance documents.	Reputational or compliance risks if project obligations are not met Financial risk if environmental and social standards are not upheld	High engagement priority Regular coordination, timely updates, and formal communication throughout the construction phases.
Contractors and suppliers	All contractors and suppliers engaged in project implementation (EPC, civil works, electrical, BESS installation, consultants)	Performing contracted work effectively. Interested in clear scope, safe working conditions, and timely payment.	Impact on project implementation timeline, quality of work, and relations with local community	High engagement priority Structured coordination meetings, clear communication of responsibilities, and integration into the project's environmental and social standards framework.
Employees of contractors	All persons engaged in the project development and construction	Good working conditions, timely payment, and safe working environment.	Occupational health and safety risks, employment conditions concerns, and the need for clear communication on responsibilities, rights, and grievance options.	High engagement priority Regular briefings, clear communication on employment terms, safety training, and access to confidential grievance mechanisms, including for sensitive issues such as GBVH.
Media	National / Regional and Local mass media	Understanding and following the project's development and key milestones.	Plays key role in shaping public perception and disseminating information about the project	Medium engagement priority

Category of stakeholders	Stakeholders	Interest in the project	Potential impacts	Engagement Priority
				Timely media updates at key milestones, and access to spokespersons.
	Social media	Posting information about project development and implementation.	Shapes public perception; misinformation risk if not proactively managed	Medium engagement priority Timely media updates at key milestones, and access to spokespersons
Other stakeholders	National and / or international NGOs	Monitoring internationally financed projects for compliance with IFI standards and environmental/social best practices.	May raise concerns about environmental and social impacts, compliance with international standards, and protection of community and ecological rights.	Medium engagement priority Targeted communication, openness to third-party monitoring, and constructive dialogue on potential concerns or improvement areas.
	Community of practitioners – other energy producers	Sharing experience and knowledge, particularly around grid access and regulatory developments in the Romanian energy sector.	Not directly affected; may have concerns related to grid access, regulatory consistency, or competition for local resources	Low to medium engagement priority Occasional participation in industry events, forums, or information exchanges to promote transparency and sector dialogue.
	Public at large	Obtaining information on project outcomes, key milestones, and contribution to Romania's energy transition.	Indirectly affected; may have broad concerns about environmental impacts, energy transition, land use, or public benefits.	Low to medium engagement priority Public access to key documents, periodic updates through accessible channels, and the availability of a clear grievance mechanism.

5. Previous Engagement Activities

In 2023, the project developer progressed with the environmental permitting process in line with the EIA Directive, specifically for the construction phase, by submitting an application for the environmental permit required to initiate construction activities. All the required engagement activities have been fulfilled by the project developer.

The project developer submitted an official letter to the Environmental Protection Agency (EPA) of Bacau to briefly introduce the project. Following this, EIA screening decision was issued, determining that the Environmental Impact Assessment (EIA) procedure should be initiated, as the authorities categorized Buciumi BESS facility under Annex II, point 3 of the EIA Directive. As a result, a Scoping Report was required, developed, and submitted to the EPA. After reviewing the report, it was concluded that the procedure would not proceed further, as the project components were assessed to have no significant impact on the environment. Therefore, the development of an Environmental Impact Assessment Report, Appropriate Assessment, or Water Impact Assessment was deemed unnecessary. For the UTL, grid connection and local road improvement works, the procedure was similar, but the process ended in the Screening phase, not considering needed to start the EIA procedure.

The land required for the project includes the land plot where the BESS facility will be located and the access roads to this land plot, which will also be used for the UTL to the main electrical station. The BESS will be located on a land plot for which a superficies and land usage agreement was signed between Energy Storage Investment (SPV) and a private landowner for a period of 30 years.

6. Stakeholder Engagement Plan

The Stakeholder Engagement Plan (SEP) will serve as the framework for the stakeholder engagement process developed for the Project. The following action plan is developed for the year 2026, which coincides with the initial stages of the Project's construction phase. The objective of these external communications is to provide continuous engagement with identified stakeholders to inform them about the activities, performance, development and investment plans and their implementation. The exact dates and venues of the proposed activities will be communicated with the stakeholders prior to and during construction and operation phases.

The tables below include information on engagement actions to be performed by Scatec and the contractors during the construction period. This plan will be updated at least once per year, or according to the project needs and the achieved results.

Table 4 Stakeholder Engagement Plan

Activity	Stakeholders targeted	Purpose of Engagement	Information Disclosed	Estimated Timeline	Responsibility
Publishing the SEP on the company website	All stakeholders	Dissemination of key project information	Stakeholders Engagement Plan	Q3 2026	Scatec
Project Announcement	Local communities, municipal authorities	Inform about the project and its benefits	Project overview, location, timeline, environmental commitments	Prior to construction start	Scatec
Grievance Mechanism Rollout	All stakeholders	Enable feedback, manage complaints	Grievance procedure, contact points, response timelines	Prior to construction start	Scatec and Contractors
Local Employment Campaign	Local workforce	Promote hiring of local labour	Job requirements, recruitment process, training programs	Prior to construction start	Contractors
Community Information Materials	Local residents, schools, interest groups	Build awareness and trust	Employment opportunities, safety measures, timeline updates	Ongoing	Scatec and Contractors
Conduct direct meetings for discussing the work conditions and timeline	Land users in the proximity of the project	Avoid complaints related to disturbances	Project information regarding the construction works, type, timeline, restrictions if any	Ongoing	Scatec and Contractors
Publishing project updates	All stakeholders	Dissemination of key project information	Key milestones	Ongoing	Scatec
One-on-one Meetings	Affected landowners and farmers	Discuss land access and mitigation	Land acquisition plans, grievance mechanism	Ongoing	Scatec and Contractors
Reporting	IFIs	Update on investment progress	Status of construction activities Status of company activity	Based on needs	Scatec

7. Enhancing Disclosure and Consultation Methods

While direct engagement with key stakeholder groups is already planned as part of this SEP, a more thorough breakdown of disclosure and consultation methods is provided below to strengthen transparency, accessibility, and inclusivity. This chapter outlines both digital and in-person communication tools, and the benefits and limitations of digital channels.

7.1. Communication Channels

To ensure timely, transparent, and inclusive stakeholder engagement, the project employs a combination of digital and non-digital communication methods. These channels are selected based on their suitability for different stakeholder groups, with particular attention to accessibility for vulnerable or rural populations.

The use of multiple formats ensures that all project-affected people have the opportunity to receive information, ask questions, and provide feedback in a manner that is convenient and meaningful for them.

Digital Communication Tools

The project will make use of a range of digital tools to disseminate information and enable feedback:

- **Social media:** To provide real-time updates and facilitate informal communication
- **Email:** For official communication with authorities, NGOs, and individual stakeholders who request digital correspondence

In-Person and Non-Digital Methods

To ensure inclusivity and accessibility, these tools will be maintained in parallel:

- **Public meetings and community briefings**
- **Community noticeboards** in each project-affected administrative unit
- **Direct engagement** through one on one discussions between the Community Liaison Officer (CLO) and relevant stakeholders

7.2. Benefits and Limitations of Digital Tools

Digital communication tools offer important benefits in stakeholder engagement, particularly in terms of speed, reach, and convenience. They allow for the rapid dissemination of updates, cost-effective messaging over time, and easier documentation and archiving of interactions. Digital platforms can also be adapted to support multiple languages and formats, potentially broadening accessibility across diverse stakeholder groups.

However, these tools are not without limitations. In rural areas, such as those surrounding the Buciumi BESS project sites, internet connectivity may be poor or unreliable, and not all residents may have access to smartphones or be familiar with digital platforms. Vulnerable groups such as the elderly, persons with disabilities, or individuals with low literacy may face additional barriers to using these channels. Moreover, informal platforms like WhatsApp or social media can spread misinformation if not carefully monitored, and it is often difficult to confirm whether messages sent digitally have been received, understood, or acted upon. As such, while digital tools are

valuable, they must be complemented by in-person engagement, printed materials, and trusted local communication channels to ensure no stakeholder is left behind.

8. Grievance Mechanism (GM)

Scatec manages community grievances through formal, transparent, and accessible grievance mechanisms integrated into its Environmental and Social Management Systems (ESMS). These mechanisms are implemented at the project level and are designed to ensure that community members and other affected stakeholders can raise concerns or complaints related to the company's activities.

Each project includes a locally adapted grievance mechanism that allows stakeholders to submit complaints in a confidential, culturally appropriate, and easily accessible manner. These systems are intended to resolve issues early and at the lowest possible level, ideally before they escalate.

8.1. What is Considered a Grievance

A grievance can be a complaint, concern, question, suggestion, or other comment about the Project and how it is implemented.

It is important to keep in mind that submitting a grievance is the first condition and also a necessary tool for Scatec, to know any concerns and to meet them. In this regard, the project companies undertake full responsibility and impartiality in managing all grievances received, the responses submitted and in conducting an open and trustworthy dialogue with all stakeholders.

The Project's grievance mechanism is designed to address a wide range of issues, including concerns related to land access, use restrictions, and compensation.

Affected landowners, tenants, and users may submit grievances if they believe that construction or operational activities have adversely impacted their land rights or if they have concerns regarding the terms or adequacy of compensation. These grievances will be treated with the same procedural rigor and impartiality as other types of complaints and will follow the standard steps of acknowledgment, investigation, resolution, and documentation.

For cases involving legal or contractual disputes over compensations, the project team will coordinate with relevant authorities and legal advisors to ensure appropriate referral and resolution, while maintaining transparency with the complainant throughout the process.

8.2. The Grievance Management Process

Scatec handles grievances, especially from community stakeholders, through a structured process aimed at timely, respectful, and transparent resolution, following the steps described in the table below. The company enforces a strict non-retaliation policy. Employees reporting concerns are protected from dismissal, demotion, or disciplinary actions, even if investigations do not substantiate the claims.

Table 5 Grievance Management

Step	Description
1. Submission	Grievances can be submitted through physical drop boxes, phone, email, or in-person discussions with the Community Liaison Officer.

2. Acknowledgment	Grievance is acknowledged within approximately 10 working days. The complainant is informed about the process and expected timelines.
3. Assessment & Investigation	The issue is logged and assessed by the responsible team. Investigations may include field visits or consultations to understand the grievance fully.
4. Response & Resolution	Simple grievances are resolved within ~30 working days. Complex ones may take longer. The company maintains communication throughout.
5. Feedback to Complainant	The resolution is communicated to the complainant. If unsatisfied, the issue can be escalated for further internal review.
6. Monitoring & Documentation	All grievances are registered, tracked, and analysed for trends. The insights are used to improve future stakeholder engagement, operational practices and to address systemic issues.

To submit a grievance to Scatec, community members and other stakeholders can use several channels:

1. **In person** – By speaking directly with Community Liaison Officer or Project representatives on site.
2. **Grievance boxes** – Located in accessible areas near project sites where written grievances can be deposited. Grievance boxes should be located outside of the scope of security cameras, so as to ensure the possibility of submitting anonymous grievances.
3. **Email** – Grievances can be submitted electronically to designated company addresses (these are usually provided during public consultations or on project-specific communication materials).
4. **Phone** – Through numbers communicated by Scatec, particularly by local site teams.
5. **Letter or mail** – Formal grievances can also be submitted in writing and sent to Scatec's headquarters or project office.

Grievance submission is open to any stakeholder, including individuals, groups, or institutions who may be affected by the company's operations or activities. Submissions can be **anonymous**, though providing contact details allows for feedback and resolution updates.

8.3. Gender-Based Violence and Harassment (GBVH) Grievances

Gender-Based Violence and Harassment (GBVH) refers to a range of harmful behaviours directed at individuals based on their sex or gender identity, including but not limited to sexual harassment, sexual assault, bullying, intimidation, physical or verbal abuse, and exploitation. GBVH can occur in the workplace, in project-affected communities, or in other contexts related to the implementation of the project.

For the purpose of this SEP, a GBVH complaint is defined as:

Any concern, allegation, or report made by a worker, contractor, community member, or other stakeholder regarding actual or perceived gender-based violence or harassment linked to the project's activities, personnel, or contractors.

GBVH complaints are handled with specialized care due to the sensitive nature and the need for survivor-centered care, confidentiality, and legal compliance.

Guiding principles:

- ❖ **Confidentiality** - Information is shared only on a need-to-know basis with the informed consent of the survivor.

- ❖ **Non-discrimination** - All individuals—regardless of gender, ethnicity, age, disability, or any other status—are treated with equal respect and dignity.
- ❖ **Non-retaliation** - No person who makes or supports a GBVH complaint shall face retaliation or discrimination.
- ❖ **Survivor-centred** – The rights of GBVH survivors will be prioritised, and survivors will be treated with dignity and respect.

All GBVH complaints will be:

- ❖ Logged securely in a confidential grievance register
- ❖ Monitored for resolution and systemic risk trends
- ❖ Reported in aggregate form (without identifying details) to E&S management and to the EBRD.

Lessons learned will inform continuous improvement of prevention and response measures, including further training, policy adjustment, and stakeholder engagement.

Survivors will be provided with, or referred to, appropriate support services, including medical care, psychosocial counselling, legal advice, and safe shelter if required. To ensure timely and effective assistance, referral contacts and agreements will be established in advance with qualified local service providers and relevant non-governmental organizations.

8.4. Contact Details

The current Grievance Mechanism is designed to enable Project Affected Persons to submit complaints, concerns, questions, suggestions or other comments about the Project and its implementation. This mechanism is in place for the whole life of the Project; PAPs are able to submit a grievance related to the Project at any time, free of charge.

PAPs can submit grievances, questions, requests, etc. either by phone, post or email, at the contact details below:

Community Liaison Officer (CLO) - TBD

Contact person:

Tel:

E-mail:

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy (2024). In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by PAPs, and civil society organisations about EBRD financed projects among project stakeholders or to determine whether the EBRD has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the EBRD.

9. Implementation, Monitoring and Evaluation

To ensure effective and responsive stakeholder engagement throughout the project lifecycle, this plan outlines a staged approach to communication, consultation, and monitoring, closely aligned with the construction schedule and the varying levels of impact on different stakeholder groups. Priority is given to those most likely to experience direct impacts.

Engagement activities will be tailored to the specific construction phase, with emphasis on anticipated impacts and required mitigation:

Table 6 Engagement activities and construction stages

Construction Phase	Key Activities	Engagement Focus
Pre-Construction (Site Prep)	Site mobilisation	Information disclosure, installation of information boards at the construction site, direct engagement with affected landowners, dissemination of GM
Early Construction	Ground works, access road upgrades, fencing	Intensive engagement with neighbouring land users and local businesses regarding access and mobility
Mid-Construction	Panel installation, cabling, substation works	Continued dialogue on work schedules, safety measures, grievance handling
Late Construction & Commissioning	Testing, landscaping, grid connection	Closeout communication, feedback collection

Engagement frequency is developed based on stakeholder risk exposure:

Table 7 Engagement frequency

Stakeholder Group	Engagement Frequency	Type of engagement
Neighbouring landowners/users	Monthly	One-on-one meetings, site visits
Local and regional authorities	Monthly / milestone-based	Formal meetings, joint inspections
General public / community members	Quarterly	Public notices, community briefings
Contractors and workers	Weekly	Progress update meeting, periodic internal audits
NGOs, media, and sector peers	Milestone-based	Targeted briefings, when and if needed

Monitoring activities will be commensurate with the environmental and social impacts and issues associated with the project. They may also reflect any significant stakeholder concerns and include an environmental and social project completion review or audit, where relevant.

In the monitoring and evaluation process for stakeholder engagement, all the consultations undertaken, all the issues raised, and the actions taken will be recorded. Also, this process implies the description of the lessons learned and any changes to the consultation process.

All queries in relation to the project will be filed in the comments registry, analysed and reported by the project implementation team to management team on a two-month basis during project implementation.

The results and feedback from information disclosure and public consultation will be documented and reported as appropriate. Summary reports – in both English and Romanian - will contain details about suggestions or concerns raised by stakeholders and how their comments have been considered.

The project companies will constantly monitor the engagement level of their stakeholders by developing a set of indicators which will include at least the following items:

- ❖ Number of communications;
- ❖ Type of communications;
- ❖ Frequency of communications;
- ❖ Number of valid complaints (and number rejected as unclear, problematic or dubious);
- ❖ Type of complaints;

- ❖ Sources of complaints;
- ❖ Number of resolved complaints;
- ❖ Average time for resolution of complaints.

A clear record of all these indicators will be kept. Where possible the indicators shall be differentiated by gender and type of stakeholder, according to the categories defined in the Stakeholder Analysis chapter. Another important aspect is the way the public is informed about the SEP. The Project developer will make publicly available the SEP on its website. Also, the SEP will be part of the annual environment and safety report of Scatec.

10. Reporting

External reporting will include timely updates to relevant stakeholders regarding Project advancement. The following activities (or some of them) shall be undertaken as part of the external reporting process:

- ❖ Public disclosure of the SEP
- ❖ Environmental reporting to national and local authorities
- ❖ Annual E&S report for IFIs

11. Roles and Responsibilities

Scatec through the CLO will be the main entity responsible for implementing this Stakeholder Engagement Plan. The responsibilities in relation to the SEP include:

- ❖ Overall SEP implementation: monitoring and reporting
- ❖ Stakeholder Engagement: Acts as the main point of contact between the project and local communities, ensuring inclusive, timely, and accessible communication.
- ❖ Grievance Management: Oversees the community grievance mechanism by receiving, tracking, and coordinating responses to concerns, ensuring transparency and timely resolution.
- ❖ Monitoring and Reporting: Gathers community feedback, monitors social risks, and maintains documentation to support compliance with EBRD's environmental and social performance requirements.
- ❖ Website: Provide access to relevant information about the project
- ❖ Mass media coverage/ Press releases/ Information disclosure: offer relevant information to the mass media and third parties
- ❖ Grievance mechanism:
 - Grievances received or identified, including filling out case details (General Information, Reported Party and Incident or claim Description/consequences sections)
 - Maintain central log of all grievances ensuring it is kept up to date
 - Issue all responses to grievance raisers and ensure the Management Team are informed.

Annex 1 – Grievance Form

PUBLIC GRIEVANCE FORM

Reference No (for internal purpose):

Full Name:

First name _____

Last name _____

☐ I wish to raise my grievance anonymously

☐ I request not to disclose my identity without my consent

Contact Information

Please mark how you wish to be contacted (mail, telephone, e-mail).

☐ By Post: Please provide mailing address:

☐ By Telephone: _____

☐ By E-mail

Preferred Language for communication

 Romanian

☐ Other, please specify

Description of Grievance:

[illegible]

If Grievance is related to a specific event/Incident;

Date of Incident

☐ One time incident/grievance (date _____)

☐ Happened more than once (how many times? _____)☐ On-going (currently experiencing problem)

Signature: _____ Date: _____

Please return this form to: Laura Diaconescu

Tel: +40728074376

E-mail: laura.diaconescu@scatec.com

Annex 2 – Grievance Log

1	2	3	4	5	6	7	8	9	10
No .	Incoming letter registration No. and date of receipt	Type and form of grievance	Full name of individual. Name of the company for legal entity	Appeal essence	Solution of the grievance	Measures taken	No. of outgoing letter and date of mailing	Person in charge	Grievance open or closed?